

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

CHRIS MATSON,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CIVIL ACTION NO.:
	)	1:20-cv-004880-LMM-RDC
	)	
CITY OF FOREST PARK,	)	
	)	
Defendant.	)	

**JOINT MOTION FOR CONSENT PROTECTIVE AND  
CONFIDENTIALITY ORDER**

COME NOW the Parties to this action, by and through their attorneys, and pursuant to Federal Rule of Civil Procedure 26(c), move this Court for a Protective and Confidentiality Order regarding confidential information and documents.

As part of this case, Plaintiff and Defendant may produce documents of a confidential and private nature. As such, the Parties move this Court for an Order protecting these documents and information from disclosure to the public as it may cause harm to the Parties, except as set forth in the Consent Protective and Confidentiality Order. A proposed Consent Protective and Confidentiality Order, which has been agreed upon and approved by the attorneys for both Parties, is attached hereto for the Court's convenience.

Respectfully submitted this 12th day of August, 2021.

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s/ Steven N. Newton

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*Attorneys for Defendant*

**CERTIFICATE OF COMPLIANCE**

The undersigned hereby certifies that this memorandum complies with the font and point selections approved by the Court in Local Rule 5.1C. This brief has been prepared in Times New Roman, 14 point.

s/ Laura A. Denton  
Laura A. Denton  
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*Attorney for Defendant*

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CITY OF FOREST PARK, GA,	)	
	)	
Defendant.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the **JOINT MOTION FOR CONSENT PROTECTIVE AND CONFIDENTIALITY ORDER** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Steven N. Newton  
Nancy B. Pridgen  
Leslie M. Bassett

This 12th day of August, 2021.

s/ Laura A. Denton  
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Georgia Bar No. 158667